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December 9, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Cheryl L. Pollak, U.S.M.J.
225 Cadman Plaza East
Courtroom 13B South
Brooklyn, NY 11201-1804

Re: Ortega v. Champagne Room BK, Inc., et al.
Case No.: 1:21-cv-1125 (NGG) (CLP)

Dear Judge Pollak:

This office represents the Plaintiff Iluminada Ortega (hereinafter the “Plaintiff”) in the above referenced case. Plaintiff writes to respectfully request an extension of time until Friday, December 27, 2024 to submit billing records in connection with the renewed letter motion for settlement approval. Plaintiff respectfully submits that good cause exists for the requested extension because your undersigned needs to coordinate with co-counsel to obtain billing records prior to my involvement in this case and because your undersigned will be out of the country from December 15, 2024 through December 24, 2024. See Fed. R. Civ. P. 6(b)(1)(A). Further, and by way of update, Plaintiff is pleased to report that the parties have fully executed the settlement agreement and anticipate submitting a copy of same once Plaintiff hears back from Defendants concerning a question related to the renewed letter motion for settlement approval.

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
December 9, 2024

Respectfully submitted,
SAGE LEGAL LLC
/s/ Emanuel Kataev, Esq.
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